



BOARD OF COOPERATIVE EDUCATIONAL SERVICES

OF NASSAU COUNTY

DIVISION OF COMPUTER AND COMMUNICATIONS SERVICES

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PGN #109

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Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street N.W.
Washington, DC 20554

To Whom it May Concern:

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

I am writing to address the FCC Notice on proposed rule making in MM Docket No. 93-106. The proposed rule (channel loading) is, as was channel mapping, a further compromise to all ITFS operators. A compromise that diminishes the purpose that originally set aside the 2500 megahertz spectrum for education.

Today more than ever, education and those ITFS operations that serve education need and indeed must have flexibility in transmitting the varied curriculum of an ever growing information revolution. Multiple Channel Transmission is the very backbone of the ITFS system - the capability of simultaneously reaching classrooms with language, science, humanities, etc. is essential and can only be accomplished when ITFS operator's have free access to all of the assigned channels. Both channel mapping and channel loading are methods of taking away this unique and essential ITFS multiple channel flexibility.

In as much as Wireless Cable has become part of the ITFS spectrum by means of the excess capacity rule and because the financial support that ITFS operators realize as a result of this rule is essential, a partnership has been created between Wireless operators and ITFS operators. It is important, at this point, for the FCC to guide this partnership. This guidance should not include any rule making that infringes on the parameters of good programming.

The following are in response to the questions posed under #18 of the FCC Notice on MM Docket 93-106:

1. Limiting channel loading to a certain number of ITFS licensed channels is of course preferred if any form of channel loading is adopted.
2. It would seem that 50% of all operators' ITFS licenses channels should always be available to the licensee.

3. The number should be scheduled during the school day (8 to 4 pm- Monday through Saturday).

4. Ready recapture of any excess channel use by Wireless operators should always be available to the host ITFS licensee with reasonable notice.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul G. Neff", written in a cursive style.

Paul G. Neff
Executive Administrator
Nassau BOCES
ITFS License KNU-43-D1 & D2

PGN/al

cc: Ted Steinke
Wayne Coy, Jr.